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PROPOSED ATTORNEYS FOR DEBTOR

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§	
	§	
ATLAS STONE DISTRIBUTION, INC.,	§	CASE NO. 19-31006-sgj
	§	Chapter 11
Debtor.	§	

DEBTOR'S MOTION FOR USE OF CASH COLLATERAL

TO THE HONORABLE UNITED STATES BANKRUPTCY COURT:

COMES NOW Atlas Stone Distribution, Inc., the Chapter 11 Debtor in the above styled and referenced bankruptcy case (the "Debtor"), and files this its Motion for Use of Cash Collateral pursuant to 11 U.S.C. § 363 of the Bankruptcy Code and in support of same would respectfully show the following:

1. On March 22, 2019, the Debtor filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code. The Debtor is now operating its business and managing its property as a debtor in possession pursuant to §§ 1107(a) and 1108 of the Bankruptcy Code. No request has been made for the appointment of a trustee or examiner and no official committee has been appointed.

2. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue of the Chapter 11 case and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. Debtor requests the Court to enter an Interim Order for Use of Cash Collateral in the form attached hereto as **Exhibit “A.”**

4. Debtor has an immediate need to use the cash collateral of UMB Bank, n.a. (the “Secured Lender”), the Debtor’s secured creditor claiming liens on Debtor’s personal property including accounts receivable. The Debtor can adequately protect the interests of the Secured Lender as set forth in the proposed Interim Order for Use of Cash Collateral by providing the Secured Lender with post-petition liens, a priority claim in the Chapter 11 bankruptcy case, and cash flow payments. The cash collateral will be used to continue the Debtor’s ongoing operations. The Debtor is an importer and distributor of high quality stone slabs and tiles, which include a vast selection of granite, marble, limestone, quartzite, onyx, soapstone and quartz, from its locations in Dallas, Chicago and St. Louis. The Budget attached to the proposed Order permits the payment of ongoing operating expenses of the Debtor in order to allow the Debtor to maintain its operations in Chapter 11. The Debtor intends to rearrange its affairs and needs to continue to operate in order to pay its ongoing expenses, generate additional income and to propose a plan in this case. The Debtor’s proposed Two-Week Budget and One-Month Budget are attached hereto as **Exhibit “B.”**

5. This is an emergency matter since the Debtor has no outside sources of funding available to it and must rely on the use of cash collateral to continue its operations.

WHEREFORE, PREMISES CONSIDERED, the Debtor respectfully requests that this Court enter an Interim Order for Use of Cash Collateral in the form attached hereto as **Exhibit “A”** and for such other and further relief to which the Debtor may be justly entitled.

Dated: March 27, 2019.

Respectfully submitted,

/s/ Joyce W. Lindauer

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 27, 2019, a true and correct copy of the foregoing document was served via email pursuant to the Court's ECF system upon the parties listed below and via United States first class mail, postage prepaid, upon the remaining parties on the attached service list.

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0539-3
Case 19-31006-sgj11
Northern District of Texas
Dallas
Wed Mar 27 11:33:03 CDT 2019

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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

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(d)Internal Revenue Service
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The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

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Bypassed recipients 8
Total 101